

BOULT  
CUMMINGS  
CONNERS  
& BERRY  
PLC

LAW OFFICES  
414 UNION STREET, SUITE 1600  
POST OFFICE BOX 198062  
NASHVILLE, TENNESSEE 37219

Henry Walker  
(615) 252-2363  
Fax: (615) 252-6363  
Email: hwalker@bccb.com

TELEPHONE (615) 244-2582  
FACSIMILE (615) 252-2380  
INTERNET WEB <http://www.bccb.com/>

January 10, 2001

David Waddell  
Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

IN RE: *In the Matter of Notice of Rulemaking Amendment of Regulations for  
Telephone Service Providers*  
Docket No. 00-00873

Dear David.

Please accept for filing the original and thirteen copies of Comments filed on behalf of XO Tennessee, Inc., and the Southeastern Competitive Carriers Association. Copies have been forwarded to parties.

Respectfully submitted,  
BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: *Henry Walker by wlm*  
Henry Walker *w/permission*

HW/wlm  
Enclosure

**BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

IN RE:       *In the Matter of Notice of Rulemaking Amendment of Regulations for Telephone  
Service Providers*  
Docket No. 00-00873

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**COMMENTS OF THE SOUTHEASTERN COMPETITIVE CARRIERS ASSOCIATION AND  
XO OF TENNESSEE REGARDING PROPOSED RULES 1220-4-2-.03(6) AND 1220-4-2-.09(6)  
THAT WILL BE ADDRESSED DURING WORKSHOP I**

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Pursuant to the Order the Hearing Officer entered in this docket on December 15, 2000, the parties signed below have reviewed the provisions of the proposed rules that will be addressed during Workshop I. The parties signed below strongly support two additions.

The TRA can only protect the confidentiality of documents through issuance of a proprietary order. It cannot be done through a blanket rulemaking. Therefore, the last sentence of Rule 1220-4-2-.30(6) should read:

"Because these reports contain confidential and competitively sensitive information, they shall be treated as Proprietary by the TRA through the issuance of an appropriate order and shall not be subject to public disclosure."

To be certain that local directory publishers treat all local telecommunications service providers equally with respect to the placement of information, proposed Rule 1220-4-2-.09(6) should read:

"Local telecommunications service providers shall provide local directory publishers with relevant information for publication concerning placing local and long distance calls, calls to repair, calls regarding billing questions as well as information services, and the

mailing address of the local telecommunications service provider.  
Such information shall be listed on a non-discriminatory basis."

In conclusion, the parties signed below request the TRA to change proposed Rules  
1220-4-2-.03(6) and 1220-4-2-.09(9) to reflect these additions.

Respectfully submitted,  
BOULT, CUMMINGS, CONNERS & BERRY,  
PLC

By: Henry Walker  
by WTM w/permission

Henry Walker No. 000272

414 Union Street, Suite 1600

P.O. Box 198062

Nashville, TN 37219

*Attorney for the Southeastern Competitive Carriers  
Association*

Dana Shaffer

by WTM w/permission

Dana Shaffer

XO Communications

105 Molloy St.

Nashville, TN 37201

*Counsel for XO Tennessee, Inc.*

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via U.S. Mail, postage prepaid, to the following on this the 10 day of January, 2001.

Dana Shaffer  
XO Tennessee, Inc.  
105 Molloy St.  
Nashville, TN 37201

Guy Hicks, Esq.  
BellSouth Telecommunications, Inc.  
333 Commerce Street  
Suite 2101  
Nashville, TN 37201-3300

*Henry Walker*  
*by WFM / permission*

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Henry Walker